

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref No. 279

**SECOND SUPPLEMENTAL DECLARATION OF BENJAMIN J. STEELE IN
SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING EMPLOYMENT AND RETENTION OF KROLL
RESTRUCTURING ADMINISTRATION LLC AS ADMINISTRATIVE
ADVISOR NUNC PRO TUNC TO THE PETITION DATE**

I, Benjamin J. Steele, under penalty of perjury, declare as follows:

1. I am a Managing Director of Kroll Restructuring Administration LLC (“Kroll”), a chapter 11 administrative services firm whose headquarters are located at 55 East 52nd Street, 17th Floor, New York, NY 10055. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. On December 21, 2022, I submitted a declaration (the “Initial Steele Declaration”) in connection with the *Debtors’ Application for Entry of an Order Authorizing the Retention of Kroll Restructuring Administration LLC as Administrative Advisor Nunc Pro Tunc to the Petition Date* [Docket No. 279] (the “Application”).² On January 20, 2023, the Application was approved by the Court. [Docket No. 544]. Additionally, on January 20, 2023, I

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Application.

filed a supplemental declaration [Docket No. 554] (the “Supplemental Steele Declaration” and together with the Initial Steele Declaration, the “Prior Declarations”). I hereby incorporate by reference, in its entirety, the Prior Declarations as if fully set forth herein.

3. In the Prior Declarations, Kroll disclosed that it is an indirect subsidiary of Kroll, LLC (“Kroll Parent”). Kroll Parent is not identified on the Potential Parties in Interest list, but Kroll made this disclosure out of an abundance of caution.

4. Since the filing of the Prior Declarations, I have learned that three clients of Kroll Parent’s Global Restructuring Practice are creditors of the Debtors in these chapter 11 cases and have filed proofs of claim asserting customer claims against the Debtors (Client A, Claim No. 80265; and Client B, Claim Nos. 82519, 82650 and 82870) or have scheduled claims against the Debtors (Client C, Schedule Nos. 7848073 and 7860046).³ As noted in the Prior Declarations, within the Kroll Parent corporate structure, Kroll operates independently from Kroll Parent. As such, any relationships that Kroll Parent and its affiliates maintain do not create an interest of Kroll’s that is materially adverse to the Debtors’ estates or any class of creditors or security holders.

5. Based on the foregoing, I believe that Kroll is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code. Moreover, to the best of my knowledge and belief, neither Kroll nor any of its partners or employees hold or represent any interest adverse to the Debtors’ estates.

³ In accordance with the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [Docket No. 3353], the names of these customers are not included in this declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Executed on November 22, 2023

/s/ Benjamin Steele

Benjamin J. Steele
Managing Director
Kroll Restructuring Administration LLC
55 East 52nd Street, 17th Floor
New York, NY 10055